

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/30/2020

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

November 30, 2020

BY CM/ECF AND EMAIL

Hon. Analisa Torres,
United States District Court,
Southern District of New York,
Daniel Patrick Moynihan U.S. Courthouse,
500 Pearl Street,
New York, NY 10007-1312.

Re: Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela,
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

I write on behalf of Defendant the Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned action (the “Action”). On October 1, 2020, this Court entered an order that, among other things, directed Plaintiffs to submit a motion for attorney’s fees by October 30, 2020, and the Republic to oppose any such motion by November 30, 2020. ECF No. 74. On October 30, Plaintiffs filed their Motion for Attorney Fees (“Plaintiffs’ Fee Motion”). ECF Nos. 82-23. Since that time, the parties have engaged in good faith discussions to attempt to reach a consensual resolution. Those discussions have not yet concluded. While the Republic had been planning to file its opposition today, Plaintiffs informed the Republic on November 28, 2020, that they consent to a two-week extension of the Republic’s time to oppose Plaintiffs’ Fee Motion in order to allow those discussions to continue. Accordingly, in an effort to avoid further litigation in this Action, the Republic respectfully requests that the Court extend the deadline for its opposition to December 14, 2020. The parties have made no previous extension requests.

Respectfully submitted,

GRANTED. By **December 14, 2020**, Defendant shall
file its opposition to Plaintiffs’ motion for attorney fees.

/s/ Joseph E. Neuhaus

Joseph E. Neuhaus

SO ORDERED.

Dated: November 30, 2020
New York, New York



ANALISA TORRES
United States District Judge